



**MISSOURI ETHICS COMMISSION**

PO Box 1370

Jefferson City, MO 65102

[www.mec.mo.gov](http://www.mec.mo.gov)

(573) 751-2020 / (800) 392-8660

James Klahr

Executive Director

October 19, 2017

Joseph Figo  
12662 Riviera Heights Rd  
Holts Summit MO 65043

Re: File No. 17-0050-I

Dear Mr. Figo:

The Missouri Ethics Commission considered the complaint filed against you at its October 16, 2017 meeting.<sup>1</sup> The complaint alleged you violated Missouri conflict of interest law when the Missouri Board of Law Examiners (MBLE) entered into a contract with ILG Technologies. The complaint alleges you accepted this contract as a stipulation of your potential employment with ILG or due to a financial benefit. The complaint notes that you were hired by ILG approximately 11 months later.

Staff review of this complaint determined that the MBLE is established under Missouri Supreme Court Rule 8.01. Its operations, equipment and expenses shall be paid from funds arising from application fees of applicants taking the Missouri Bar Exam (Rule 8.01(b)). Because the MBLE is not a "political subdivision" as defined in Section 105.450(9), RSMo, the conflict of interest statutes that apply to certain conduct of elected or appointed officials or employees of a state agency or political subdivision do not apply to the conduct of officials or employees of the MBLE.<sup>2</sup>

The Commission is dismissing the complaint as it has no jurisdiction because the MBLE is not a political subdivision for purposes of the Missouri conflict of interest laws found in Sections 105.450 – 105.467, RSMo.

Sincerely,

Handwritten signature of James Klahr in cursive.

James Klahr  
Executive Director

<sup>1</sup> Huckfeldt, Nowogrocki, Jordan, Schermerhorn, Gardner and Levings were included as Respondents in their capacity as members of the Board of Law Examiners.

<sup>2</sup> Section 105.450(9) defines a "political subdivision" to include any political subdivision of the state, and any special district or subdistrict.